

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNIVERSAL PROTECTION SERVICE,
LLC D/B/A ALLIED UNIVERSAL
SECURITY SERVICES,

Plaintiff,

v.

SALIH KOC,

Defendants.

Case No: 1:23-cv-10617

**MOTION FOR TEMPORARY
RESTRAINING ORDER AND FOR
ORDER TO SHOW CAUSE WHY A
PRELIMINARY INJUNCTION SHOULD
NOT ISSUE**

Expedited Hearing and Oral Argument Request

Plaintiff Universal Protection Service, LLC d/b/a Allied Universal Security Services (“Allied Universal” or “Plaintiff”), consistent with Fed. R. Civ. P. 65, by and through its undersigned attorneys, move this Court to enter a Temporary Restraining Order and Preliminary Injunction (“Motion”). This Motion is supported by a Memorandum of Law in Support of the Motion, the Declarations of Scott Lorberbaum, and Ezra Alter and supporting exhibits, all of which are included below and filed herewith.

WHEREFORE, by this Motion, Allied Universal seeks a temporary restraining order (“TRO”) to prevent the immediate and irreparable harm likely to be suffered by Allied Universal due to the ongoing misconduct of Defendant Salih Koc (“Koc”). This misconduct includes violations of multiple post-employment restrictive covenants, and brazen misappropriation of Allied Universal’s confidential information and trade secrets. This TRO should remain in place for the maximum period permitted by law while the parties conduct expedited discovery in preparation for a hearing on Plaintiff’s request for a preliminary injunction.

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DATED: December 5, 2023

/s/ Ezra Alter

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